

PROPOSED JUDGMENT
17-CV-06557 JSC

1 judgment for the Court's consideration.

2 The parties have met and conferred regarding Plaintiff's claim for attorneys' fees and costs and
3 have reached agreement to reserve their respective rights and re-visit the issue following Plaintiff's
4 expected appeal of the Court's judgment in this action.

5 In order to permit Plaintiff's expected appeal to proceed, the parties respectfully request that the
6 Court enter the proposed judgment in this action.

7 IT IS SO STIPULATED.

8 Dated: November 1, 2018

ALEX G. TSE
United States Attorney

10 /s/ Robin M. Wall

11 Robin M. Wall
Assistant United States Attorney
Attorneys for Defendant
U.S. Department of Justice

13 Dated: November 1, 2018

D. VICTORIA BARANETSKY

15 /s/ D. Victoria Baranetsky

16 D. Victoria Baranetsky
Attorney for Plaintiff
Center for Investigative Reporting

18 **CERTIFICATION**

19 Pursuant to Civil Local Rule 5-1(i)(3), the undersigned hereby attests that Victoria Baranetsky
20 has concurred in the filing of this document.

21 Dated: November 1, 2018

ALEX G. TSE
United States Attorney

23 /s/ Robin M. Wall

24 Robin M. Wall
Assistant United States Attorney
Attorneys for Defendant
U.S. Department of Justice

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21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 THE CENTER FOR INVESTIGATIVE
25 REPORTING,

26 Plaintiff,

27 v.

28 UNITED STATES DEPARTMENT OF
JUSTICE,

Defendant.

) CASE NO. 3:17-cv-06557-JSC

) **PROPOSED JUDGMENT**

JUDGMENT

The issues having been fully considered, and the Court having granted in part and denied in part the parties' cross-motions for summary judgment, it is hereby Ordered and Adjudged that judgment be entered in part in favor of Defendant against Plaintiff, as set forth in the Court's order of July 10, 2018

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1 (ECF 39) and that the action be dismissed.

2 SO ORDERED.

3
4 Dated: _____, 2018

5 HON. JACQUELINE SCOTT CORLEY
6 United States Magistrate Judge
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